

**Federal Defenders  
OF NEW YORK, INC.**

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January 20, 2021

**BY ECF**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

1/21/2021

The request to travel is denied. SO  
ORDERED.



**Re: United States v. Baudilio Reyes  
20 Cr. 507 (PAC)**

Dear Judge Crotty,

I respectfully write on behalf of my client, Baudilio Reyes, to request that he be given permission to travel to Eustis, Florida (just outside of Orlando), to attend a close family friend's wedding. The wedding is scheduled for January 30<sup>th</sup> and Mr. Reyes will travel to Florida on Friday January 29<sup>th</sup> and travel back to New York on Sunday January 31<sup>st</sup> (Wedding Invitation attached as Exhibit A). Mr. Reyes will travel to and from the wedding with his family. The groom, Mr. Jorge Ramos, is like a brother to Mr. Reyes, and articulates that "I will be so lost if he [Mr. Reyes] wouldn't be able to attend my big day" (Exhibit B, Letter from Jorge Ramos). Mr. Reyes will communicate his whereabouts with his Pre-Trial Services (PTS) officer. PTS objects to this application because it is office policy to oppose overnight travel for defendants subject to home detention. PTS officer John Rothman notes that Mr. Reyes is fully compliant with his conditions of release. The Government defers to Pretrial on this application.

On 7/30/2020, the following bail conditions were set for Mr. Reyes by Judge Cave: \$50,000 PRB; 2 FRP'S; Travel Limited to SDNY/EDNY & ED PA (& Points in Between for Travel to/from Court); Surrender Travel Documents (& No New Applications); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft to Continue or Seek Employment; Deft Not to Possess Firearm/Destructive Device/Other Weapon.

On 8/31/2020 Judge Cott modified Mr. Reyes' bail from home incarceration to home detention. Since then, Mr. Reyes has been employed and has abided by all the conditions of his bond.

Respectfully submitted,  
/s/ \_\_\_\_\_  
Zawadi Baharanyi  
Assistant Federal Defender

cc: Benjamin Schrier (ECF).

# EXHIBIT A



[View RSVP](#)

# EXHIBIT B

Dear Judge Crotty,

My name is Jorge Ramos and I am reaching out to you in regards to my brother Baudilio Reyes who although isn't my blood brother has been like my brother for over 20 years. He plays a very huge role in my life as well as my kids and soon to be wife. I will be so lost if he wouldn't be able to attend my big day. I do understand that mistakes have been made in the past and no one is perfect but my brother is a changed man, and since I've known him, he has never hurt anyone. My brother is harmless, caring, and loving. I will personally hold myself accountable for the time being spent with me while he is down here if you agree to let him attend my wedding.

I will appreciate you taking this into consideration and letting him attend this one special day. If there is anything I can do to help him be here, by my side, please let me know. Feel free to contact me at [REDACTED] if you have any questions.

Thank you again for understanding,

Sincerely,  
Jorge Ramos